



Marc A. Al

Partner

33 South Sixth Street, Suite 4200

Minneapolis, MN 55402

Direct dial: (612) 373-8801

marc.al@stoel.com

May 6, 2025

VIA ECF

The Honorable Shannon G. Elkins
United States Magistrate Judge
United States District Court, District of Minnesota
316 North Robert Street
Saint Paul, MN 55101

**Re: IV Media, LLC and IV Media Properties, LLC v. Pontus IMB Portfolio,
LLC, and Pontus Net Lease Advisors, LLC**

District Court File No. 25-cv-01358 (JMB/SGE)

Bankruptcy Court Adversary File No. 25-03043 (WJF)

Dear Judge Elkins:

I represent Plaintiffs IV Media, LLC (“IV Media”) and IV Media Properties, LLC (“IV Properties”), and write in response to Mr. Harayda’s correspondence to Magistrate Judge Cowan Wright filed via ECF yesterday afternoon prior to the reassignment of this case to you.

A notice of appearance on behalf of IV Media and IV Properties and an objection to the notice of removal filed by Mr. Harayda on behalf of Pontus IMB Portfolio, LLC, and Pontus Net Lease Advisors, LLC, has been filed with the Bankruptcy Court. We anticipate filing more formal pleadings in the next day or two challenging the Bankruptcy Court’s jurisdiction, as we respectfully submit that “a notice of removal seeking to [remove a district court case to bankruptcy court] is a nullity and has no legal effect.” *Sweet Charlie’s Franchising, LLC v. Sweet Moo’s Rolled Ice Cream, LLC*, 2020 U.S. Dist. LEXIS 107675, *4 (E.D. Pa. June 19, 2020) (citing *In re Halvorson*, No. 18-525, 2018 WL 6728484, at *9 (C.D. Cal. Dec. 21, 2018)). To streamline matters, it may be helpful for the District Court to hold a short status conference after we file those more formal pleadings.

Very truly yours,

Stoel Rives LLP

A handwritten signature in black ink, appearing to read 'Marc A. Al', is written over a horizontal line.

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cc: C.J. Harayda, Esq., Stinson law firm (via ECF)
Timothy M. Kelley, Esq., Stinson law firm (via email)
Thomas A. Hallin, Esq., Oakland Lawyers Group PLLC (via email)
Christiane H. McKinley, Esq., Oakland Lawyers Group PLLC (via email)
Lauren Cohn, Esq., Oakland Lawyers Group PLLC (via email)
Andrea N. Dean, Esq., Oakland Lawyers Group PLLC (via email)
Bryan T. Glover, Esq., Stoel Rives LLP law firm (via ECF)
Brandon E. Lira, Esq., Stoel Rives LLP law firm (via email)